City of Arlington Texas

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March 26, 2001

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The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 00-32

Dear Mr. Chairman,

I am writing you on behalf of the City of Arlington to express our concern about the FCC's intention to auction 50 MHz of spectrum in the 4940-4990 MHz (4.9 GHz) band, rather than allocating this critically needed spectrum to public safety for new broadband public safety applications.

The City of Arlington is charged with the responsibility of protecting and serving over 330,000 citizens. To better serve them, we have deployed wireless devices that are used by the Police, Fire, Water and Code Compliance departments. All of these departments are seeing an immediate return on their investment, primarily from cost avoidance due to the new, more cost effective processes implemented.

Examples of recent applications include field record generation by our water and code compliance departments. The police department uses wireless technology for emergency response to calls for service and soon will be conducting virtual briefings from the field by way of our intranet, thus eliminating the need for the traditional 30 minute daily briefings.

Our present bandwidth is taxed to the limit and additional bandwidth will be required to expand these types of services. We are relying on technology to assist in carrying out our mission and have an immediate need for advanced solutions such as those below.

In 1996, the public safety community identified the need for 95 MHz of additional spectrum to meet communications needs over the next ten years. Of this amount, the greatest need will be for advanced wideband and broadband technologies. To date, the FCC has allocated 24 MHz to public safety users in the new 746 MHz band. There are new emerging broadband technologies and applications appearing on the horizon that will require significantly wider bandwidths.

Solutions such as personal and vehicular area networks can wirelessly integrate a variety of existing and future devices to provide a safer environment for our police officers. These include image and video cameras and viewers, mobile data computers and all their peripheral devices, palmtops, and wireless long-range headsets, microphones, earpieces and voice recognition to allow complete hands free operation. Very large data and image files can be rapidly and wirelessly transferred within Wireless Local Area Networks (WLAN), enabling images/fingerprints of wanted or missing persons, video clips of robberies, maps and layouts to be downloaded into police vehicle mobile computers as they leave the station. This same technology will also allow wireless uploads of videos, images and reports from the police vehicle to the communication center. WLAN technology will also enable centers to employ full motion video for remote controlled robotics in terrorist and other highly dangerous operations, and monitoring of officers or suspects in officer assistance and high risk situations to allow on scene decision making and assistance based on video transmissions. This technology would allow real time transmission of video and imagery from surveillance helicopters to command centers.

101 West Abram Street • Box 231 • Arlington, Texas 76004-0231 • (817) 275-3271 • (Metro 817) 265-3311

Solutions such as personal area networks (PAN) can wirelessly integrate a variety of lifesaving tools into the firefighter's suit and helmet. These include biometric and environmental sensors, 3D location, video and thermal imaging cameras, wireless microphones and earpieces, and voice recognition to allow complete hands-free and wire-free operation of all communications. High speed wireless data links transmit this vital information to fire ground command centers, allowing them to constantly monitor the location and vital signs of all firefighters and help them navigate through smoke-filled burning buildings. These technologies could provide a critical link for quickly locating disoriented or downed firefighters before fatal injuries are sustained. Very large data and image files can be rapidly and wirelessly transferred within Wireless Local Area Networks, enabling graphics such as maps, images and building blueprints to be downloaded into fire vehicle mobile computers as they leave the firehouse. WLAN technology will also enable fire ground command centers to employ full motion video for remote controlled robotics in intense fires, hazardous material and bomb disposal, and dangerous search and rescue operations. This technology would allow real time transmission of video and imagery from aircraft to fire ground commanders.

Although unlicensed consumer oriented broadband technologies are on the horizon in the nearby 5 GHz band, cities cannot rely on unlicensed spectrum for our mission critical applications. We must have dedicated spectrum and systems that assure the safety of our personnel via immediate priority access, uninterrupted transmissions, and guaranteed coverage and reliability. The proximity of this unlicensed band to the proposed public safety 4.9 GHz allocation allows us to leverage such standards based broadband technologies and yet have the dedicated, reliable, secure and enhanced featured broadband solutions that we require for our mission critical applications.

Several of our representative public safety organizations, including APCO, IACP and Major Cities Chiefs, have recently urged the FCC to allocate 50 MHz at 4.9 GHz for broadband public safety applications.

The City of Arlington urges you and the Commission to recognize our broadband spectrum needs and allocate the 4.9 GHz band to the public safety community. Obtaining this spectrum is a critical step for our public safety and utility departments to access these new advanced broadband solutions for our mission critical applications.

Sincerely,

Gerard Eads
Communications Administrator
City of Arlington
P.O. Box 231
Arlington, Texas 76004

Copy to:
Office of the Secretary
Ms. Magalie Roman Sallas
445 12th Street, SW
Washington, DC 20554

City of Arlington Texas
PO Box 231 • 76004-0231

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